



**Advocates for Rural Broadband**

Matt Johnson  
*President*

Kelly Worthington  
*Executive Vice President*

March 9, 2026

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**RE:** Reforming Legacy Rules for an All-IP Future; Accelerating Network Modernization,  
Notice of Proposed Rulemaking, WC Docket Nos. 25-311 and 25-208

Dear Ms. Dortch:

On Thursday, March 5, 2026, Derrick Owens and Stephen Goodman of WTA – Advocates for Rural Broadband (“WTA”), along with WTA members Evelyn Jerden (LICT), Mark Gailey (Totah Communications), Larry Frazier (Central Arkansas Telephone Coop), Jon Cannon (Rally Networks), Katie Williams (WK&T), Rhonda Goddard (Nex-Tech) and Karen Jackson-Furman (WK&T), met in-person with Callie Coker, Legal Advisor to Chairman Carr, to discuss rural broadband and telecommunications issues, including the above-captioned proceeding. WTA emphasized all of the “moving parts” that must be addressed in a holistic fashion to ensure a smooth transition to all-IP networks. These issues include: where interconnection occurs and where the network edge is defined; who bears the costs of transport; NG911 coordination; intercarrier compensation; reliability; cybersecurity (including the risks of DDoS attacks); CALEA compliance; jurisdictional assignments of IP traffic (and the possible impact on State USF funds); federal USF reforms; the need for subsidies for the short-term costs increases to implement all-IP networks; and the required transition period. Ms. Goddard explained that her company began the transition to an all-IP network over 20 years ago, and some work still remains. Further complicating the transition are the shortages of chips and fiber due to data center demands. Moreover, WTA emphasized that as an overarching principle, Congress directed the Commission in Section 254(b)(3) of the Communications Act to ensure that rates and services in rural areas are comparable to rates and services in urban areas.

Respectfully submitted,

**WTA – ADVOCATES FOR RURAL BROADBAND**

/s/ Stephen L. Goodman  
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cc: Callie Coker